

February 8, 2022

VIA ECF

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Victor Rivera, Case No. 21-CR-221 (SHS)

Dear Judge Stein:

This firm represents defendant Victor Rivera in the referenced matter. Mr. Rivera self-surrendered and made his initial appearance before this Court on March 24, 2021, at which time he was released principally on a \$100,000 Personal Recognizance Bond along with certain travel restrictions. This Court continued the conditions of Mr. Rivera's pre-trial release following his change of plea hearing yesterday. I write today to respectfully request a modification to the terms of Mr. Rivera's pre-trial release. In particular, Mr. Rivera seeks to visit with his mother's family in Puerto Rico from February 25-28, 2022. Although he has not yet purchased a plane ticket, he intends to fly from New York to Puerto Rico on February 25, 2022 and to return to New York on February 28, 2022. Mr. Rivera intends to stay with his mother's family while in Puerto Rico and will provide his U.S. Pretrial Services Officer with the details on his flights once he purchases his ticket. I have spoken with AUSA David Abramovicz, who stated that the government would defer to U.S. Pretrial Services on Mr. Rivera's proposed travel (just as he stated in court yesterday). I also spoke with U.S. Probation Officer Vincent Adam, who advised me that he has no objection to Mr. Rivera's proposed travel as detailed herein.

Accordingly, we respectfully request that this Court enter an Order modifying the terms of Mr. Rivera's pre-trial release so that he may travel from New York to Puerto Rico from February 25-28, 2022 to visit with his mother's family.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/

Harlan Protass

cc: David Abramovicz, Esq. (via ECF)
Assistant United States Attorney

Vincent Adam (via e-mail)
U.S. Probation Officer